Amendments to and Listing of the Claims:

Please amend claims 1-7, 9, 11-14, 16, 18-23, 30, 37-39 and 41-42 as follows:

1.   (Currently amended) A computer-implemented data-processing method for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using variable life insurance contracts, the method comprising:

(a) entering, via at least one user interface, actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan;

(b) based on the actuarial data, electronically generating a variable life insurance policy;

(c) ~~used to~~ fund<u>ing</u> the ~~Section 412(i)~~ qualified defined benefit pension plan <u>using the variable life insurance policy</u>; ~~and~~

~~(e)~~ <u>(d)</u> electronically generating a separate agreement that extra-contractually modifies the variable life insurance policy ~~so as to enable a guaranty of the plan benefits~~, wherein the plan includes the policy and the separate agreement<u>; and</u>

<u>(e) providing a guaranty of the plan benefits using the plan's policy and separate agreement</u>.

2.   (Currently amended) A computer-implemented data-processing method for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using variable life insurance contracts, the method comprising:

(a) entering, via at least one user interface, actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan;

(b) based on the actuarial data, electronically generating a variable life insurance policy;

(c) ~~used to~~ fund<u>ing</u> the ~~Section 412(i)~~ qualified defined benefit pension plan <u>using the variable life insurance policy</u>; ~~and~~

~~(e)~~ <u>(d)</u> electronically generating a separate agreement that defines the terms under which the variable life insurance policy is to be used in the defined benefit pension plan ~~so as to~~

~~enable a guaranty of plan benefits~~, wherein the plan includes the policy and the separate agreement; and

(e) providing a guaranty of the plan benefits using the plan's policy and separate agreement.

3.   (Currently amended) A computer-implemented data-processing method for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using variable annuity contracts, the method comprising:

(a) entering, via at least one user interface, actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan;

(b) based on the actuarial data, electronically generating a variable annuity policy;

(c) ~~used to~~ funding the ~~Section 412(i)~~ qualified defined benefit pension plan using the variable annuity policy; ~~and~~

~~(e)~~ (d) electronically generating a separate agreement that extra-contractually modifies the variable annuity policy ~~so as to enable a guaranty of the plan benefits~~, wherein the plan includes the policy and the separate agreement; and

(e) providing a guaranty of the plan benefits using the plan's policy and separate agreement.

4.   (Currently amended) A computer-implemented data-processing method for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using variable annuity contracts, the method comprising:

(a) entering, via at least one user interface, actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan;

(b) based on the actuarial data, electronically generating a variable annuity policy;

(c) ~~used to~~ funding the ~~Section 412(i)~~ qualified defined benefit pension plan using the variable annuity policy; ~~and~~

~~(e)~~ (d) electronically generating a separate agreement that defines the terms under which the variable annuity policy is to be used in the defined benefit pension plan ~~so as to enable~~

~~a guaranty of the plan benefits~~, wherein the plan includes the policy and the separate agreement; and

(e) providing a guaranty of the plan benefits using the plan's policy and separate agreement.

5.   (Currently amended) A computer-implemented data-processing method for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using at least one of life insurance contracts and annuity contracts, the method comprising:

(a) entering, via at least one user interface, actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan;

(b) based on the actuarial data, electronically generating at least one policy selected from the group including a life insurance policy and an annuity policy[[,]];

(c) ~~the selected policy used to~~ funding the ~~Section 412(i)~~ qualified defined benefit pension plan using the selected at least one policy; ~~and~~

~~(c)~~ (d) electronically generating a separate agreement that extra-contractually modifies the selected at least one policy ~~so as to enable a guaranty of the plan benefits~~, wherein the plan includes the separate agreement and at least one of the policies; and

(e) providing a guaranty of the plan benefits using the plan's separate agreement and at least one policy.

6.   (Currently amended) The method of claim 5, further comprising:

~~(d)~~ (f) determining a negotiated guaranteed rate of return for the defined benefit pension plan.

7.   (Currently amended) The method of claim 6, further comprising:

~~(e)~~ (g) determining, after a predetermined period of time, whether earnings based on funds contributed to the defined benefit pension plan exceed the guaranteed rate of return, and if so, setting an "actual earnings" parameter to determine future contributions to the defined benefit pension plan.

8.   (Original) The method of claim 5, wherein the life insurance policy is a variable life insurance policy and the annuity policy is a variable annuity policy.

9.   (Currently amended) The method of claim 5, further comprising:

(d) (f) electronically generating a software illustration associated with the selected at least one policy based on information received from at least one remotely located processor that processed the actuarial data.

10.   Canceled.

11.   (Currently amended) The method of claim 5, further comprising:

(d) (f) allocating funds contributed to the defined benefit pension plan between a General Account and a Variable Account.

12.   (Currently amended) A computer-implemented data-processing method for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using at least one of life insurance contracts and annuity contracts, the method comprising:

(a) entering, via at least one user interface, actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan;

(b) based on the actuarial data, electronically generating at least one policy selected from the group including a life insurance policy and an annuity policy[[,]];

(c) ~~the selected policy used to~~ funding the ~~Section 412(i)~~ qualified defined benefit pension plan using the selected at least one policy; ~~and~~

(e) (d) electronically generating a separate agreement that defines the terms under which the selected at least one policy is to be used in the defined benefit pension plan ~~so as to enable a guaranty of the plan benefits~~, wherein the plan includes the separate agreement and at least one of the policies; and

(e) providing a guaranty of the plan benefits using the plan's separate agreement and at least one policy.

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13.   (Currently amended) The method of claim 12, further comprising:

(d) (f) determining a negotiated guaranteed rate of return for the defined benefit pension plan.

14.   (Currently amended) The method of claim 13, further comprising:

(e) (g) determining, after a predetermined period of time, whether earnings based on funds contributed to the defined benefit pension plan exceed the guaranteed rate of return, and if so, setting an "actual earnings" parameter to determine future contributions to the defined benefit pension plan.

15.   (Original) The method of claim 12, wherein the life insurance policy is a variable life insurance policy and the annuity policy is a variable annuity policy.

16.   (Currently amended) The method of claim 12, further comprising:

(d) (f) electronically generating a software illustration associated with the selected at least one policy based on information received from at least one remotely located processor that processed the actuarial data.

17.   Canceled.

18.   (Currently amended) The method of claim 12, further comprising:

(d) (f) allocating funds contributed to the defined benefit pension plan between a General Account and a Variable Account.

19.   (Currently amended) A system for creating a Section 412(i) qualified defined benefit pension plan funded using variable life insurance contracts, the system comprising:

(a) at least one user interface for entering actuarial data used to create the defined benefit pension plan; and

(b) at least one processor that receives the actuarial data from the user interface and, in response, electronically generates a ~~Section 412(i)~~ qualified defined benefit pension plan that includes:

(i) a variable life insurance policy;

(ii) ~~used to fund the Section 412(i)~~ a source of funding for the qualified defined benefit pension plan using the variable life insurance policy; ~~and~~

~~(ii)~~ (iii) a separate agreement that extra-contractually modifies the variable life insurance policy; and

(iv) ~~so as to enable~~ a guaranty of the plan benefits using the plan's policy and separate agreement.

20.   (Currently amended) A system for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using variable life insurance contracts, the system comprising:

(a) at least one user interface for entering actuarial data used to create the defined benefit pension plan; and

(b) at least one processor that receives the actuarial data from the user interface and, in response, electronically generates a ~~Section 412(i)~~ qualified defined benefit pension plan that includes:

(i) a variable life insurance policy;

(ii) ~~used to fund the Section 412(i)~~ a source of funding for the qualified defined benefit pension plan using the variable life insurance policy; ~~and~~

~~(ii)~~ (iii) a separate agreement that defines the terms under which the variable life insurance policy is to be used in the defined benefit pension plan; and

(iv) ~~so as to enable~~ a guaranty of the plan benefits using the plan's policy and separate agreement.

21.   (Currently amended) A system for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using variable annuity contracts, the system comprising:

(a) at least one user interface for entering actuarial data used to create the defined benefit pension plan; and

(b) at least one processor that receives the actuarial data from the user interface and, in response, electronically generates a ~~Section 412(i)~~ qualified defined benefit pension plan that includes:

(i) a variable annuity policy~~;~~

(ii) ~~used to fund the Section 412(i)~~ a source of funding for the qualified defined benefit pension plan using the variable annuity policy; ~~and~~

~~(ii)~~ (iii) a separate agreement that extra-contractually modifies the variable annuity policy; and

(iv) ~~so as to enable~~ a guaranty of the plan benefits using the plan's policy and separate agreement.

22.   (Currently amended) A system for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using variable annuity contracts, the system comprising:

(a) at least one user interface for entering actuarial data used to create the defined benefit pension plan; and

(b) at least one processor that receives the actuarial data from the user interface and, in response, electronically generates a ~~Section 412(i)~~ qualified defined benefit pension plan that includes:

(i) a variable annuity policy~~;~~

(ii) ~~used to fund the Section 412(i)~~ a source of funding for the qualified defined benefit pension plan using the variable life insurance policy; ~~and~~

~~(ii)~~ (iii) a separate agreement that defines the terms under which the variable annuity policy is to be used in the defined benefit pension plan; and

(iv) ~~so as to enable~~ a guaranty of the plan benefits using the plan's policy and separate agreement.

23.   (Currently amended) A system for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using at least one of life insurance contracts and annuity contracts, the system comprising:

(a) at least one user interface for entering actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan; and

(b) at least one processor that receives the actuarial data from the user interface and, in response, electronically generates a ~~Section 412(i)~~ qualified defined benefit pension plan that includes:

(i) at least one policy, selected from the group including a life insurance policy and an annuity policy; ~~and~~

(ii) a source of funding for the qualified defined benefit pension plan using the selected at least one policy;

~~(ii)~~ (iii) a separate agreement that extra-contractually modifies the selected at least one policy; and

(iv) ~~so as to enable~~ a guaranty of the plan benefits using the plan's policy and separate agreement.

24.   (Original) The system of claim 23, wherein a negotiated guaranteed rate of return is determined for the defined benefit pension plan by the processor.

25.   (Original) The system of claim 24, wherein, after a predetermined period of time, the processor determines whether earnings based on funds contributed to the defined benefit pension plan exceed the guaranteed rate of return, and if so, an "actual earnings" parameter is set to determine future contributions to the defined benefit pension plan.

26.   (Original) The system of claim 23, wherein the life insurance policy is a variable life insurance policy and the annuity policy is a variable annuity policy.

27.   (Original) The system of claim 23, wherein the processor electronically generates a software illustration associated with the selected policy based on information received from at least one remotely located processor that processed the actuarial data.

28.   Canceled.

29.   (Original) The system of claim 23, wherein funds contributed to the defined benefit pension plan are allocated between a General Account and a Variable Account.

30.   (Currently amended) A system for creating a ~~Section 412(i)~~ qualified defined benefit pension plan funded using at least one of life insurance contracts and annuity contracts, the system comprising:

(a) at least one user interface for entering actuarial data used to create the ~~Section 412(i)~~ qualified defined benefit pension plan; and

(b) at least one processor that receives the actuarial data from the user interface and, in response, electronically generates a ~~Section 412(i)~~ qualified defined benefit pension plan that includes:

(i) at least one policy, selected from the group including a life insurance policy and an annuity policy; ~~and~~

(ii) <u>a source of funding for the qualified defined benefit pension plan using the selected at least one policy;</u>

~~(ii)~~ <u>(iii)</u> a separate agreement that defines the terms under which the selected <u>at least one</u> policy is to be used in the defined benefit pension plan<u>; and</u>

<u>(iv)</u> ~~so as to enable~~ a guaranty of the plan benefits <u>using the plan's policy and separate agreement</u>.

31.   (Original) The system of claim 30, wherein a negotiated guaranteed rate of return is determined for the defined benefit pension plan by the processor.

32.   (Original) The system of claim 31, wherein, after a predetermined period of time, the processor determines whether earnings based on funds contributed to the defined benefit pension plan exceed the guaranteed rate of return, and if so, an "actual earnings" parameter is set to determine future contributions to the defined benefit pension plan.

33.   (Original) The system of claim 30, wherein the life insurance policy is a variable life insurance policy and the annuity policy is a variable annuity policy.

34.   (Original) The system of claim 30, wherein the processor electronically generates a software illustration associated with the selected policy based on information received from at least one remotely located processor that processed the actuarial data.

35.   Canceled.

36.   (Original) The system of claim 30, wherein funds contributed to the defined benefit pension plan are allocated between a General Account and a Variable Account.

37.   (Currently amended) A computer-implemented data-processing method for creating a defined benefit pension plan funded using at least one of life insurance contracts and annuity contracts, the method comprising:

        (a) entering, via at least one user interface, actuarial data used to create the defined benefit pension plan;

        (b) based on the actuarial data, electronically generating at least one policy selected from the group including a life insurance policy and an annuity policy[[,]];

        (c) the selected policy used to funding the defined benefit pension plan using the selected at least one policy, wherein the plan includes the at least one policy; and

        (e) (d) allocating funds contributed to the defined benefit pension plan between a General Account and a Variable Account so as to enable a guarantee of such that the allocation guarantees the plan benefits[[,]] wherein the plan includes the at least one policy.

38.   (Currently amended) The method of claim 37, further comprising:

        (d) (e) determining a negotiated guaranteed rate of return for the defined benefit pension plan.

39.   (Currently amended) The method of claim 38, further comprising:

(e) (f) determining, after a predetermined period of time, whether earnings based on funds contributed to the defined benefit pension plan exceed the guaranteed rate of return, and if so, setting an "actual earnings" parameter to determine future contributions to the defined benefit pension plan.

40.   (Previously presented) The method of claim 37, wherein the life insurance policy is a variable life insurance policy and the annuity policy is a variable annuity policy. ·

41.   (Currently amended) The method of claim 37, further comprising:

(d) (e) electronically generating a software illustration associated with the selected policy based on information received from at least one remotely located processor that processed the actuarial data.

42.   (Currently amended) A system for creating a defined benefit pension plan funded using at least one of life insurance contracts and annuity contracts, the system comprising:

(a) at least one user interface for entering actuarial data used to create the defined benefit pension plan; and

(b) at least one processor that receives the actuarial data from the user interface and, in response,(i) electronically generates a defined benefit pension plan that includes:

(i) at least one policy selected from the group including a life insurance policy and an annuity policy[[,]];

(ii) the selected policy used to fund a source of funding for the defined benefit pension plan using the selected at least one policy[[,]]; and

(ii) (iii) allocates an allocation of funds contributed to the defined benefit pension plan between a General Account and a Variable Account so as to enable a guarantee of such that the allocation guarantees the plan benefits[[,]] wherein the plan includes the at least one policy.

43.   (Previously presented) The system of claim 42, wherein a negotiated guaranteed rate of return is determined for the defined benefit pension plan by the processor.

44.   (Previously presented) The system of claim 43, wherein, after a predetermined period of time, the processor determines whether earnings based on funds contributed to the defined benefit pension plan exceed the guaranteed rate of return, and if so, an "actual earnings" parameter is set to determine future contributions to the defined benefit pension plan.

45.   (Previously presented) The system of claim 42, wherein the life insurance policy is a variable life insurance policy and the annuity policy is a variable annuity policy.

46.   (Previously presented) The system of claim 42, wherein the processor electronically generates a software illustration associated with the selected policy based on information received from at least one remotely located processor that processed the actuarial data.